

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION, a  
Delaware corporation,

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,  
an Indiana corporation, and ACE  
AMERICAN INSURANCE  
COMPANY, a Pennsylvania  
corporation.

Defendants.

Case No. 16-cv-1054 (WMW/DTS)

**JOINT MOTION REGARDING**  
**CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following  
motion:

**Defendants Federal Insurance Company and ACE American  
Insurance Company's Motion to Amend Scheduling Order  
(Dkt. 845)**

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
851	852	Defendants' Memorandum of Law in Support of Motion to Amend Scheduling Order	a) None  b) The Parties agree the information may be unsealed.  c) None		The document should be <u>unsealed</u> because no confidential or business sensitive information exists in the filing
856	N/A	Exhibit 9 to Declaration of Terrence J. Fleming in Support of Motion to Amend Scheduling Order: Excerpts from Deposition of Jean-Luc Marce.	a) The Parties agree this Exhibit should remain sealed.  b) None.  c) None.		Defendants' Exhibit 9 should remain sealed to:  Protect detailed technical information relating to FICO's Blaze Advisor® Software and the extent relationship between versions, which a competitor could use to gain an unfair advantage in developing its own competing software product or products (e.g. version control). Additionally, the deposition testimony should remain sealed as it contains FICO's software development strategy

					which would be advantageous to a competitor of FICO.
856-1	N/A	Exhibit 14 to Declaration of Terrence J. Fleming in Support of Motion to Amend Scheduling Order: Deposition Exhibit 609 (Software Code Overview)	a) The Parties agree this Exhibit should remain sealed.  b) None.  c) None.		Defendants' Exhibit 14 should remain sealed to:  Protect detailed technical information relating to FICO's Blaze Advisor® Software and the extent relationship between versions, which a competitor could use to gain an unfair advantage in developing its own competing software product or products (e.g. version control).
856-2	N/A	Exhibit 16 to Declaration of Terrence J. Fleming in Support of Motion to Amend Scheduling Order: Deposition Exhibit 610 (Software Code Overview)	a) The Parties agree this Exhibit should remain sealed.  b) None.  c) None.		Defendants' Exhibit 16 should remain sealed to:  Protect detailed technical information relating to FICO's Blaze Advisor® Software and the extent relationship between versions, which a competitor could use to gain an unfair advantage in developing its own competing software product or products (e.g. version control).
860	861	Plaintiff's Memorandum of Law in Opposition to Defendants' Motion to Amend Scheduling Order	a) The Parties agree this Memorandum should remain sealed.		Plaintiff's Memorandum of Law should remain sealed as it contains detailed technical information

			b) None c) None		relating to FICO's Blaze Advisor® Software and the extent relationship between versions, which a competitor could use to gain an unfair advantage in developing its own competing software product or products (e.g. version control).  Plaintiff has already filed a redacted version making non-sensitive information publicly available.
863	N/A	Exhibit 2 to Declaration of Heather Kliebenstein in Support of Plaintiff's Opposition to Defendants' Motion to Amend Scheduling Order: Excerpts from the Rule 30(b)(6) Deposition of John Taylor	a) The Parties agree this Exhibit should remain sealed. b) None. c) None.		Plaintiff's Exhibit 2 should remain sealed to:  Protect Defendants' inter-company service agreements that contain highly sensitive business information regarding strategy for product development and services within the Chubb Group of Insurance Companies. Competitors could gain unfair advantages from these contracts by learning intricate details about Chubb's business strategy.
863-1	N/A	Exhibit 4 to Declaration of Heather Kliebenstein in Support of Plaintiff's Opposition to Defendants' Motion to Amend Scheduling Order:	a) The Parties agree this Exhibit should remain sealed. b) None.		Plaintiff's Exhibit 4 should remain sealed to:  Protect detailed technical information relating to FICO's Blaze Advisor®

		Excerpts from Deposition of Jean-Luc Marce.	c) None.		Software and the extent relationship between versions, which a competitor could use to gain an unfair advantage in developing its own competing software product or products (e.g. version control). Additionally, the deposition testimony should remain sealed as it contains FICO's software development strategy which would be advantageous to a competitor of FICO.
863-2	N/A	Exhibit 7 to Declaration of Heather Kliebenstein in Support of Plaintiff's Opposition to Defendants' Motion to Amend Scheduling Order: Deposition Exhibit 610 (Software Code Overview)	a) The Parties agree this Exhibit should remain sealed. b) None. c) None.		Plaintiff's Exhibit 7 should remain sealed to:  Protect detailed technical information relating to FICO's Blaze Advisor® Software and the extent relationship between versions, which a competitor could use to gain an unfair advantage in developing its own competing software product or products (e.g. version control).
863-3	N/A	Exhibit 9 to Declaration of Heather Kliebenstein in Support of Plaintiff's Opposition to Defendants' Motion to Amend Scheduling Order:	a) The Parties agree this Exhibit should remain sealed. b) None.		Plaintiff's Exhibit 9 should remain sealed to:  Protect detailed technical information relating to Defendants' internal IT

		Deposition Exhibit 575 (Email and Attachment Discussing Defendants' Software Application and Technology Mapping Summary)	c) None.		infrastructure, which a competitor could use to gain an unfair advantage in developing its own similar IT infrastructure.
863-4	N/A	Exhibit 10 to Declaration of Heather Kliebenstein in Support of Plaintiff's Opposition to Defendants' Motion to Amend Scheduling Order: Deposition Exhibit 575 (Email and Attachment Discussing Defendants' Internal Software Application Structure)	a) The Parties agree this Exhibit should remain sealed. b) None. c) None.		Plaintiff's Exhibit 10 should remain sealed to:  Protect detailed technical information relating to Defendants' internal IT infrastructure, which a competitor could use to gain an unfair advantage in developing its own similar IT infrastructure.
863-5	N/A	Exhibit 11 to Declaration of Heather Kliebenstein in Support of Plaintiff's Opposition to Defendants' Motion to Amend Scheduling Order: Deposition Exhibit 575 (Email and Attachment Discussing Defendants' Software Application and Technology Mapping Summary)	a) The Parties agree this Exhibit should remain sealed. b) None. c) None.		Plaintiff's Exhibit 11 should remain sealed to:  Protect detailed technical information relating to Defendants' internal IT infrastructure, which a competitor could use to gain an unfair advantage in developing its own similar IT infrastructure.

Dated: January 26, 2022

/s/ Joseph W. Dubis

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